

EXHIBIT P

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION**

Linda J. Norwood,

Plaintiff, and)	
)	
The Orange Grove Center, Inc.)	
)	
Plaintiffs/Counter-Defendant.)	
)	Civil Action Number 1:23-cv-00111
v.)	DCLC-CHS
)	
Disability Rights Tennessee,)	
)	
Defendant/Counter Plaintiff.)	

DECLARATION OF LISA CRAWFORD

1. I make this declaration based on personal knowledge.
2. I am over 18 years of age and am competent to testify to the facts set forth below.
3. I have been trained in the use of American Sign Language (ASL) since 2004 .
4. I have an associate's degree in American Sign language from Chattanooga State Community College, which I received in 2004.
5. In 2007 I received my Education Interpreter Performance Assessment which certified me to work for the education systems in Tennessee and Georgia as an interpreter.
6. I worked as a certified interpreter in the education system for 14 years.
7. I have known John Doe¹ for two and a half years.
8. I interpret for John Doe through ASL weekly at services at the Brainard Hills Baptist Church in Chattanooga TN.

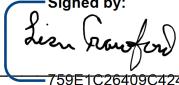
¹ John Doe is the ward of Plaintiff Linda Norwood in this case.

9. John Doe is very involved in the church, and I interact with and interpret for him through ASL when he attends various church events in addition to the weekly services.
10. John Doe knows and communicates in ASL. It has been his preferred and primary method of communication for as long as I have known him.

FURTHER THE DECLARANT SAYETH NOT.

I state under penalty of perjury under the laws of the United States of America, including but not limited to 28 U.S.C. Section 1746, that the foregoing is true and correct.

Executed in Chattanooga, Tennessee on August 30th, 2024.

Signed by:
X 
759E1C26409C424...

Lisa Crawford

EXHIBIT Q

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION**

Linda J. Norwood,

Plaintiff, and)	
)	
The Orange Grove Center, Inc.)	
)	
Plaintiffs/Counter-Defendant.)	
)	Civil Action Number 1:23-cv-00111
v.)	DCLC-CHS
)	
)	
Disability Rights Tennessee,)	
)	
)	
Defendant/Counter Plaintiff.)	

DECLARATION OF MATT CALKINS

1. I make this declaration based on personal knowledge.
2. I am over 18 years of age and am competent to testify to the facts set forth below.
3. I am an employee Partnership for Families, Children, and Adults in Chattanooga, Tennessee (PFCA). My job title is Client Services Coordinator. I work with deaf individuals daily as part of my job.
4. I attended Lee University and received a minor in Deaf Studies.
5. I am fluent in American Sign Language (ASL).
6. I have known John Doe¹ for over two years. I see him at least four or five times per week when he visits PFCA.
7. John Doe knows and communicates in ASL. When he visits PFCA, I communicate with him in ASL.

¹ John Doe is the ward of Plaintiff Linda Norwood in this case.

FURTHER THE DECLARANT SAYETH NOT.

I state under penalty of perjury under the laws of the United States of America, including but not limited to 28 U.S.C. Section 1746, that the foregoing is true and correct.

Executed in Chattanooga, Tennessee on August 07, 2024.

X Matt Calkins

Matt Calkins

EXHIBIT R

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION**

Linda J. Norwood,

Plaintiff, and)	
)	
The Orange Grove Center, Inc.)	
)	
Plaintiffs/Counter-Defendant.)	
)	Civil Action Number 1:23-cv-00111
v.)	DCLC-CHS
)	
Disability Rights Tennessee,)	
)	
Defendant/Counter Plaintiff.)	

DECLARATION OF MARY YATES

1. I make this declaration based on personal knowledge.
2. I am over 18 years of age and am competent to testify to the facts set forth below.
3. I have been trained in the use of American Sign Language (ASL) since 1979.
4. I have known John Doe¹ for over eight years.
5. From 2016 to 2021, I worked at Partnership for Families, Children, and Adults in Chattanooga, Tennessee (PFCA), where I saw and communicated with him through ASL at least four or five times per week when he visited PCFA.
6. I still communicate with John Doe through ASL on a regular basis when I interpret for him at the Brainard Hills Baptist Church every few months.

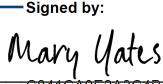
¹ John Doe is the ward of Plaintiff Linda Norwood in this case.

7. Earlier this year, I took him to see the film, "Jesus: A Deaf Missions Film", in which the actors used only ASL. John Doe was thrilled to experience a movie in his primary language.
8. John Doe knows and communicates in ASL. That has been my primary method of communication with him for the eight years I have known him.

FURTHER THE DECLARANT SAYETH NOT.

I state under penalty of perjury under the laws of the United States of America, including but not limited to 28 U.S.C. Section 1746, that the foregoing is true and correct.

Executed in Chattanooga, Tennessee on August 29th, 2024.

Signed by:
X 
Mary Yates
C841CA0E2A3C4BA...

Mary Yates

EXHIBIT S

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION**

Linda J. Norwood,

Plaintiff, and)	
)	
The Orange Grove Center, Inc.)	
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Plaintiffs/Counter-Defendant.)	
)	Civil Action Number 1:23-cv-00111
v.)	DCLC-CHS
)	
Disability Rights Tennessee,)	
)	
Defendant/Counter Plaintiff.)	

DECLARATION OF KRIS DAVIS

1. I make this declaration based on personal knowledge.
2. I am over 18 years of age and am competent to testify to the facts set forth below.
3. I have been deaf since the age of two.
4. My primary language is American Sign Language (ASL).
5. I am an employee Partnership for Families, Children, and Adults in Chattanooga, Tennessee (PFCA). My job title is Director of Deaf Services. I have held this position since January of 2024. I work with deaf individuals daily as part of my job.
6. I attended Gallaudet University and then transferred to Shenandoah University where I received a degree in theater.
7. I have known John Doe¹ since January 2024. I see him at least four or five times per week when he visits PCFA.

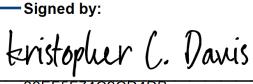
¹ John Doe is the ward of Plaintiff Linda Norwood in this case.

8. John Doe knows and communicates in ASL. When he visits PCFA, I communicate with him in ASL.

FURTHER THE DECLARANT SAYETH NOT.

I state under penalty of perjury under the laws of the United States of America, including but not limited to 28 U.S.C. Section 1746, that the foregoing is true and correct.

Executed in Chattanooga, Tennessee on August 20, 2024.

Signed by:

X _____
30EF5F74C9CD4DB...

Kris Davis

EXHIBIT T

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION**

Linda J. Norwood,

Plaintiff, and)	
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The Orange Grove Center, Inc.)	
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Plaintiffs/Counter-Defendant.)	
)	Civil Action Number 1:23-cv-00111
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)	
Disability Rights Tennessee,)	
)	
Defendant/Counter Plaintiff.)	

DECLARATION OF AMANDA YEGGY

1. I make this declaration based on personal knowledge.
2. I am over 18 years of age and am competent to testify to the facts set forth below.
3. I have been trained in the use of American Sign Language (ASL) since 2000 .
4. I have an Associate Degree in Deaf Studies from Tennessee Temple University in Chattanooga, TN, which I received in 2002. I took two additional years of sign language after that but am not a certified interpreter.
5. I have known John Doe¹ for over 20 years and met him through Deaf Ministry at Highland Park Baptist Church, which was associated with the university I attended.
6. Though I did not interpret for him at that time, I knew he used ASL to communicate even then.

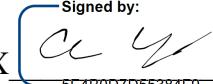
¹ John Doe is the ward of Plaintiff Linda Norwood in this case.

7. For the last past three and a half years, I interpret for John Doe through ASL on a weekly basis at services held at the Brainerd Hills Baptist Church in Chattanooga, TN.
8. Additionally, I interact with him through ASL when he attends events at the Church outside of services.
9. John Doe knows and communicates in ASL. ASL is, and has been, his primary and preferred means of communication for the over 20 years I've known him.

FURTHER THE DECLARANT SAYETH NOT.

I state under penalty of perjury under the laws of the United States of America, including but not limited to 28 U.S.C. Section 1746, that the foregoing is true and correct.

Executed in Chattanooga, Tennessee on August 30, 2024.

Signed by:
X 
5E4B0D7D55384F9...

Amanda Yeggy

EXHIBIT U

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION**

Linda J. Norwood,

Plaintiff, and)	
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The Orange Grove Center, Inc.)	
)	
Plaintiffs/Counter-Defendant.)	
)	Civil Action Number 1:23-cv-00111
v.)	DCLC-CHS
)	
Disability Rights Tennessee,)	
)	
Defendant/Counter Plaintiff.)	

DECLARATION OF BELINDA ECHOLS

1. I make this declaration based on personal knowledge.
2. I am over 18 years of age and am competent to testify to the facts set forth below.
3. I have been deaf since the age of two.
4. My primary language is American Sign Language (ASL).
5. I am an employee Partnership for Families, Children, and Adults in Chattanooga, Tennessee (PFCA). My job title is Scheduler for the Deaf. I have held this position since June 10, 2024. I work with deaf individuals daily as part of my job.
6. I have a General Education Diploma (GED).
7. I have known John Doe¹ since June 10, 2024. I see him at least four or five times per week when he visits PCFA.

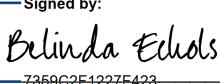
¹ John Doe is the ward of Plaintiff Linda Norwood in this case.

8. John Doe knows and communicates in ASL. When he visits PCFA, I communicate with him in ASL.

FURTHER THE DECLARANT SAYETH NOT.

I state under penalty of perjury under the laws of the United States of America, including but not limited to 28 U.S.C. Section 1746, that the foregoing is true and correct.

Executed in Chattanooga, Tennessee on August ²⁶ _____, 2024.

Signed by:
X 
7369C2F1227F423...

Belinda Echols